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INTELLIGENT TRANSPORTATION SOCIETY OF AMERICA

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July 14, 1995

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

**VIA MESSENGER**

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: Ex Parte Submission, CC Docket 94-102

Dear Mr. Caton:

On behalf of the Intelligent Transportation Society of America ("ITS America"), this letter will address the impact of the FCC's proposals in the above-referenced proceeding on the National Program Plan for deployment of an Intelligent Transportation infrastructure. By its NPRM in this Docket, the FCC has proposed to adopt rules to require Commercial Mobile Radio Services ("CMRS") providers to phase-in over five years the system capabilities necessary to provide Enhanced-911 ("E-911") service.

ITS America is a non-profit educational and scientific organization whose purpose is to coordinate and promote the research, development and deployment of Intelligent Transportation Systems ("ITS") in the United States.<sup>1</sup> With a membership comprised of federal, state and local government, private industry, and academic interests, ITS America is a public/private partnership and serves as a utilized Federal Advisory Committee to the U.S. Department of Transportation ("USDOT").

Over the past five years, ITS America has served as the focal point for public and private sector cooperation in enabling the expeditious deployment of ITS services and products throughout the U.S. and in realizing the goals articulated by Congress in the Intermodal Surface Transportation Efficiency Act of 1991 ("ISTEA"). ITS America has developed a Strategic Plan for the implementation of ITS systems within the United States that has been recognized by the FCC and many others as authoritative, has participated in the on-going ITS Architecture development program under the auspices of the USDOT, has coordinated with USDOT the preparation of the National Program

<sup>1</sup>The views expressed herein are those of ITS America and are not necessarily shared by each of the individual members of the Society.

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Mr. William F. Caton  
July 14, 1995  
Page 2

Plan for ITS (the "Program Plan") that has identified a set of twenty nine user services to be accommodated within the ITS infrastructure and has promoted at every turn consensus on the deployment of an ITS infrastructure in the U.S.

ITS America commends the FCC for its leadership in recognizing the many important public benefits of ITS services and products in this and other Dockets. Indeed, the FCC has clearly stated its commitment to ITS:

Today's creation of TIRS clearly demonstrates this agency's commitment to the continued integration of radio-based technologies into the nation's transportation infrastructure and our commitment to the development and implementation of the nation's intelligent transportation systems of the future.

Amendment of Part 90 of the Commission's Rules to Adopt Regulations for Automatic Vehicle Monitoring Systems, FCC 95-41 (February 6, 1995) at paras. 5-6. In the NPRM (at paras. 29-30), the FCC again acknowledged the "promise and importance" of ITS technology, which merits "special consideration" by this Commission.

The Program Plan identifies seven "bundles" of user services. ITS America believes that the enabling of E-911 capability within the nation's wireless communications systems will facilitate the introduction and deployment of a number of the user services identified within the Program Plan.

The sixth bundle identified in the Program Plan is entitled "Emergency Management" and includes the Emergency Notification and Personal Security, and the Emergency Vehicle Management user services. The Emergency Notification and Personal Security user service provides immediate notification of an incident and an immediate request for assistance. The Emergency Vehicle Management user service reduces the time it takes emergency vehicles to respond to an incident. Collectively, these emergency services are at the core of the many safety benefits that are offered by ITS, which were estimated in 1992 in the ITS America Strategic Plan to reduce traffic fatalities by eight percent, or 3,300 lives saved each year. We believe at this time that this estimate likely will prove conservative.

As described in the Program Plan, the Emergency Notification and Personal Security user service contemplates an immediate incident notification and an immediate request for assistance in the event of a collision or other accident. These emergency

Mr. William F. Caton  
July 14, 1995  
Page 3

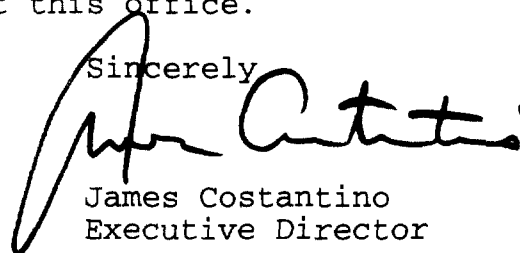
communications could either be user-initiated distress calls or automatic collision notification in the event of driver incapacity. The provision of location information to the answering point of these MAYDAY calls is contemplated by the Program Plan.

Other ITS user services identified in the Program Plan will also require an Automatic Location Information ("ALI") capability such as that which would be integrated into the nation's CMRS systems under the FCC's proposal. For example, the Hazardous Material Incident Response user service contemplates that when an incident involving a truck or railcar carrying hazardous materials occurs, the location of the incident and the nature of the material, or materials involved, would be electronically provided to emergency personnel and enforcement personnel responding to the incident. Additional ITS user services that would be furthered by the integration of ALI capability into CMRS systems include among them incident management, traveler services information and traffic control.

The Program Plan, in addition, calls for reliance by the ITS user services where possible upon existing communications infrastructure. The FCC's proposal generally would further the integration of ITS capability into existing communications infrastructure and thus would both hasten the deployment of ITS services and enhance the utility of that infrastructure in the ITS deployment. As such, ITS America advocates the deployment of wireless E-911 services.

We appreciate the opportunity to participate in the discussions on the NPRM. If there are any questions regarding this submission, please contact this office.

Sincerely

A handwritten signature in black ink, appearing to read "James Costantino", is written over the word "Sincerely".

James Costantino  
Executive Director

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